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The Honorable Dean Brett

JUL 08 2014

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
BY WESTERN DISTRICT OF WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALI MUHAMMAD BROWN,

Defendant.

NO.

**MJ 14-282**

COMPLAINT FOR VIOLATION

Title 18, United States Code, Section 1073

BEFORE the Honorable Dean Brett, United States Magistrate Judge, U.S.  
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**  
**(Flight to Avoid Prosecution)**

On or about June 1, 2014, at Seattle, within the Western District of Washington,  
the defendant, ALI MUHAMMAD BROWN, did move and travel in interstate commerce  
from Seattle, State of Washington, to the State of New Jersey, with the intent to avoid  
prosecution under the laws of the State of Washington for the crime of Aggravated  
Murder in the First Degree, which is a felony under the laws of the State of Washington.

COMPLAINT/BROWN - 1

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1 All in violation of Title 18 United States Code, Section 1073.

2  
3 The undersigned Complainant, Randy Moore, being duly sworn, further deposes  
4 and states as follows:

5 1. I am a Special Deputy with the United States Marshals Service, having  
6 been so employed since 2001, and as such am vested with the authority to investigate  
7 violations of Federal laws, including Title 18, United States Code, Section 1073. I am a  
8 Seattle Police Detective presently assigned to the U.S. Marshals Service sponsored  
9 Pacific Northwest Violent Offender Task Force in the Western District of Washington.  
10 The following is information developed during my investigation, and also information  
11 provided to me by other law enforcement sources.

12 2. On July 1, 2014, Ali Muhammad BBROWN was charged in the King  
13 County Superior Court for violation of Revised Code of Washington 9A.30.030,  
14 Aggravated Murder in the First Degree (2 counts) under Cause #14-1-03028-9. An arrest  
15 warrant was issued for his arrest. This case has been adopted by the Pacific Northwest  
16 Violent Offender Task Force, and I am assigned as the primary fugitive investigator.

17 3. According to Seattle Police Homicide Detective Cloyd Steiger, on June 1,  
18 2014, BROWN fatally shot the two unarmed victims multiple times with a 9mm  
19 handgun. BROWN's palm print was found on the interior of the rear driver's side  
20 window which was matched to BROWN by fingerprint technicians. During the  
21 subsequent investigation, BROWN's wife, L.W. told investigators that her Smith &  
22 Wesson M&P 9mm handgun was missing and that she believed that BROWN had taken  
23 it.

24 4. During the course of this fugitive investigation I was able to determine that  
25 BROWN left the State of Washington soon after the murders on June 1, 2014, and  
26 traveled to the State of New Jersey.

27 5. On June 25, 2014, the West Orange, New Jersey Police Department  
28 responded to a murder which had occurred in the area of Northfield Avenue & Walker

1 Road. The unarmed victim had been shot numerous times with a 9mm handgun while he  
2 was in the driver's seat of his vehicle. Subsequent analysis of the shell casings at the  
3 murder scene resulted in a ballistic match to the shell casings found at the Seattle murder  
4 scene. As of this date, BROWN has not yet been charged in this crime.

5 6. On June 29, 2014, the Point Pleasant Beach, New Jersey Police Department  
6 responded to an armed robbery which had just occurred at a downtown coffee shop. In  
7 this crime, BROWN approached the victim outside the coffee shop and demanded his  
8 money and car keys. The victim ran inside the shop, and BROWN chased him inside and  
9 pointed a 9mm handgun at the victim and again demanded his money and keys. The  
10 victim complied, and BROWN fled the shop and attempted to steal the victim's car.  
11 However, the vehicle was a manual transmission and BROWN's attempt to drive it away  
12 failed. BROWN fled on foot and abandoned his backpack. Investigating officers found  
13 documents inside the backpack indicating that it belonged to BROWN. Also inside the  
14 backpack, detectives found a fully loaded 9mm magazine for a Smith & Wesson M&P  
15 handgun. Point Pleasant Beach Police Detectives researched the name of "Ali BROWN"  
16 and discovered that he was a suspect in the Seattle Police Murder investigation, and then  
17 notified Detective Steiger that BROWN was in New Jersey. BROWN was also identified  
18 by photo montage as the assailant by the robbery victim and other witnesses at the coffee  
19 shop scene.

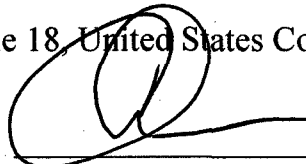
20 7. Further investigation by the Point Pleasant Beach detectives revealed that  
21 on June 28, 2014, BROWN attempted to pay for a meal at a local restaurant with a bad  
22 check. BROWN offered to call his brother, A.F. to pay for the meal by credit card, which  
23 he did. BROWN called his brother's Seattle cell phone number and the bill was paid to  
24 the restaurant manager over the phone. BROWN identified himself to the restaurant  
25 manager as "Ali BROWN". Surveillance video was obtained from the restaurant, and the  
26 images on the camera match known photos of Ali Muhammad BROWN.

27 8. Based on the above facts, I respectfully submit that there is probable cause  
28 to believe that Ali Muhammad BROWN did travel to New Jersey and traveled there to

COMPLAINT/BROWN - 3

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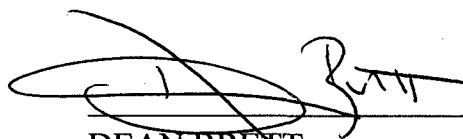
1 avoid prosecution in the State of Washington for Aggravated Murder, and therefore there  
2 is probable cause to believe that Ali Muhammad BROWN committed the offense of  
3 Flight to Avoid Prosecution, in violation of Title 18, United States Code, Section 1073.



Randy Moore,  
Special Deputy, US Marshals Service

4  
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6  
7  
8  
9 Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
10 presence, the Court hereby finds that there is probable cause to believe the Defendant  
11 committed the offense set forth in the Complaint.  
12

13 Dated this 8 day of July, 2014.



DEAN BRETT  
United States Magistrate Judge